

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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**Dahl Automotive Onalaska Inc.  
dba Dahl Lincoln  
561 Theater Road  
Onalaska, WI 54650**

**Garbo Motor Sales, Inc.  
dba Garbo Lincoln  
3077 Douglas Avenue  
Racine, WI 53402**

**Case No. 20cv932**

**Griffin Ford Lincoln Fort Atkinson, Inc.  
1642 Janesville Avenue  
Fort Atkinson, WI 53538**

**Jim Olson Ford Lincoln, LLC  
440 South Duluth Avenue  
Sturgeon Bay, WI 54235**

**Kayser Ford, Inc., dba Kayser Lincoln  
2303 West Beltline Highway  
Madison, WI 53713**

**Kunes Country Ford-Lincoln, Inc.  
1234 East Geneva Street  
Delavan, WI 53115**

**Lidtke Motors, Inc.  
701 Park Avenue  
Beaver Dam, WI 53916**

**The Motor Company, Inc.  
dba Lincoln of Marinette  
W1680 US Highway 41  
Marinette, WI 54143**

**Uptown Motors, Inc.  
2111 N. Mayfair Road  
Milwaukee, WI 53226**

**V & H Automotive, Inc.  
2414 North Central Avenue  
Marshfield, WI 54449**

**Y & D Corp.  
dba Dorsch Lincoln  
2641 Eaton Road  
Green Bay, WI 54311,**

**Plaintiffs,**

**v.**

**Ford Motor Company  
dba Lincoln Motor Company  
One American Road  
Dearborn, Michigan 48126,**

**Defendant.**

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**COMPLAINT**

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The above-named plaintiffs complain against the defendant as follows:

**OVERVIEW OF THIS ACTION**

1. Each of the plaintiffs in this action is a motor vehicle dealer enfranchised by the defendant Ford Motor Company dba Lincoln Motor Company (“Lincoln”) to sell and service Lincoln passenger cars and light trucks (“vehicles”). The plaintiffs’ franchises include the right to buy vehicles from Lincoln for resale. Under the terms of their dealer agreements with Lincoln, the plaintiffs pay an invoice price per vehicle that is established by Lincoln, but are eligible to receive a certain amount, which Lincoln refers to as “margin,” back from Lincoln after the vehicle has been sold. The amount of “margin” that a dealer receives is equal to a percentage of the vehicle’s manufacturer’s suggested retail price (“MSRP”) and effectively reduces the net price that the dealer pays for the vehicle. From 2012 until July of this year, the maximum margin that a dealer was eligible to receive per vehicle purchased and resold was